## UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS Dallas Division

CHARLENE CARTER,

Civil Case No. 3:17-cv-02278-X

Plaintiff,

V.

JOINT MOTION FOR THE ENTRY OF STIPULATED PROTECTIVE ORDER

SOUTHWEST AIRLINES CO., AND TRANSPORT WORKERS UNION OF AMERICA, LOCAL 556,

Defendants.

Pursuant to Fed. R. Civ. P. 26(c), Plaintiff Charlene Carter, Defendant Southwest Airlines Co., and Defendant Transport Workers Union of America Local 556, by and through their attorneys, have agreed to the contents of the Stipulated Protective Order ("Order") attached to this Motion, and respectfully move the Court to enter the Order.

DATED: October 4, 2019 Respectfully submitted,

By: s/ Jason E. Winford (with permission)

David E. Watkins

Texas Bar No. 20922000 dwatkins@jenkinswatkins.com

Jason E. Winford

Texas Bar No. 00788693

jwinford@jenkinswatkins.com JENKINS & WATKINS, P.C.

4300 MacArthur Avenue, Ste. 165

Dallas, Texas 75209

Tel: 214-378-6675

Fax: 214-378-6680

By: s/ Matthew B. Gilliam

Matthew B. Gilliam (pro hac vice)

New York Bar No. 5005996

By: s/ Brian K. Morris (with permission)

Brian K. Morris

Texas Bar No. 24108707 bmorris@reedsmith.com

REED SMITH LLP

811 Main Street, Suite 1700

Houston, Texas 77002-6110 Tel: 713-469-3815

Fax: 713-469-3899

By: s/ Michele Haydel Gehrke (with permission)

Michele Haydel Gehrke (pro hac vice)

California Bar No. 215647

mgehrke@reedsmith.com

REED SMITH LLP

101 Second Street, Suite 1800

mbg@nrtw.org

Jeffrey D. Jennings (pro hac vice)

Virginia Bar No. 87667

jdj@nrtw.org

Foundation, Inc.

8001 Braddock Road, Suite 600

Springfield, Virginia 22160

Tel: 703-321-8510 Fax: 703-321-9319

Attorneys for Plaintiff

San Francisco, CA 94105-3659

Tel: 415-543-8700 Fax: 415-391-8269

c/o National Right to Work Legal Defense Attorneys for Defendant Southwest Airlines Co.

By: s/ Adam S. Greenfield (with permission)

Edward B. Cloutman, III Texas Bar No. 04411000 ecloutman@lawoffices.email

Adam S. Greenfield Texas Bar No. 24075494 agreenfield@candglegal.com LAW OFFICE OF CLOUTMAN & GREENFIELD, P.L.L.C.

3301 Elm Street

Dallas, Texas 75226-1637

Tel: 214-939-9222 Fax: 214-939-9229

Attorneys for Defendant Transport Workers

Union of America, Local 556

## CERTIFICATE OF CONFERENCE

I hereby certify that I have conferred with counsel for all parties regarding the Joint Motion for the Entry of a Protective Order and the proposed Stipulated Protective Order, and they are both unopposed.

s/ Matthew B. Gilliam

Attorney for Plaintiff Charlene Carter

## **CERTIFICATE OF SERVICE**

I certify that, on this day, the foregoing was electronically filed with the Clerk of Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

s/ Matthew B. Gilliam

Attorney for Plaintiff Charlene Carter